



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

SK/EMR/PP/MED
F. #2019R00927

271 Cadman Plaza East
Brooklyn, New York 11201

December 9, 2022

By E-mail and ECF

César de Castro, Esq.
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Florian Miedel, Esq.
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New York, New York 10004

Re: United States v. Genaro Garcia Luna
Criminal Docket No. 19-576 (BMC)

Dear Counsel:

Pursuant to 18 U.S.C. § 3500, the government is disclosing to you the enclosed material related to 19 potential witnesses, including additional material for three witnesses whose § 3500 material was previously produced. This production is marked “Protected Material” and is subject to the terms of the Court’s February 18, 2020, Protective Order. See Dkt. No. 19. In addition, three folders of material are marked as “Attorney’s Eyes Only” and are subject to the Court’s June 27, 2022, Protective Order. See Dkt. No. 102. The government will disclose additional § 3500 material related to these witnesses as it becomes available and will produce § 3500 material regarding other witnesses sufficiently in advance of trial.

The government also notes that there remain two potential cooperating witnesses whose materials are not included in today's production. The government will provide their § 3500 material to the defense as soon as practicable.

Very truly yours,

BREON PEACE
United States Attorney

By: /s/
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cc: Clerk of Court (BMC) (via ECF)